

**IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

DAVID P. DONOVAN,

Plaintiff,

v.

BETH A. WILKINSON,

Defendant.

Civil Action No. 1:20-cv-1344

**BETH WILKINSON'S SEALED PRAECIPE
REGARDING EXHIBIT W6 TO HER DECLARATION**

Ms. Wilkinson files this praecipe to inform the Court that an incorrect document was attached as exhibit W6 to her declaration filed in connection with her opposition to Mr. Donovan's motion for a preliminary injunction. *See* Dkt. No. 55-1 at pages 69-72 (Page ID# 836-839). Should the Court find it appropriate in reviewing the currently pending objections, Ms. Wilkinson can provide the correct exhibit to the Court at its convenience and file it under seal.

Ms. Wilkinson's opposition to preliminary injunction recounts a July 21, [REDACTED] conversation regarding [REDACTED]

[REDACTED]. [REDACTED]

[REDACTED]

[REDACTED] *See* Dkt. No. 55 at 8.

Ms. Wilkinson submitted a declaration with her opposition to preliminary injunction. Dkt. No. 55-1. As part of that declaration, the undersigned intended to append, as exhibit W6, Ms. Wilkinson's [REDACTED]. However, due to an error, counsel appended Ms. Wilkinson's [REDACTED] that is also described in her opposition to

preliminary injunction. *See* Dkt. No. 55 at 6-7; Dkt. No. 55-1 at 69-72. Counsel informed Mr. Donovan's counsel of this issue early in the redaction process. Because Mr. Donovan voluntarily dismissed his lawsuit, and because Judge Davis agreed that [REDACTED] should remain sealed, counsel saw no need to substitute [REDACTED] as the appropriate exhibit W6.

Given the Team's pending redactions objections, some of which relate to passages that [REDACTED] Ms. Wilkinson stands ready to file the [REDACTED] under seal. Because the Team and Mr. Donovan oppose her doing so, Ms. Wilkinson is not attaching the [REDACTED] here.

Dated: June 2, 2021

Respectfully submitted,

Beth Wilkinson

By: /s/ Thomas G. Connolly
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CERTIFICATE OF SERVICE

I hereby certify that on this date, I caused a true copy of this document to be served via ECF and by email on all parties.

Dated: June 2, 2021

/s/ Thomas G. Connolly
Thomas G. Connolly